

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

JEROME E. MILKO,

Plaintiff,

v.

NATIONAL ASSOCIATION OF  
REALTORS,

Defendant.

Civil Action No. 1:25-cv-02088-SEG

**DEFENDANT NATIONAL ASSOCIATION OF REALTORS®  
MOTION TO DISMISS THE COMPLAINT**

Defendant National Association of REALTORS® files this Motion to Dismiss Plaintiff's Complaint (ECF No. 1) pursuant to Rule 12(b)(2), Rule 12(b)(3), and Rule 12(b)(6) of the Federal Rules of Civil Procedure because this Court lacks jurisdiction over Defendant, this judicial district is the improper venue to hear this case, and the Complaint fails to state a claim upon which relief can be granted against Defendant, respectively. In support of this motion, Defendant submits the accompanying memorandum of law and Declaration of Mark Birschbach.

*/s/Mark G. Trigg*\_\_\_\_\_

Mark G. Trigg

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*Counsel for Defendant National  
Association of REALTORS®*

**CERTIFICATE OF SERVICE**

I certify that on August 5, 2025, National Association of REALTORS®' Motion to Dismiss Plaintiff's Complaint was electronically filed with the Clerk of the Court using the CM/ECF system, which will serve all counsel of record.

/s/Mark G. Trigg  
Mark G. Trigg  
Georgia Bar No. 716295

*Counsel for Defendant National  
Association of REALTORS®*